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**BEFORE THE PUBLIC UTILITIES COMMISSION**
**OF THE STATE OF CALIFORNIA**

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| Order Instituting Rulemaking Regarding Policies, Procedure and Rules for California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues. | Rulemaking 06-03-004 (Filed March 2, 2006) |

# REPLY COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION ON THE PROPOSED DECISION ADDRESSING COMMUNITY CHOICE AGGREGATION NET ENERGY METERING SERVICE OPTION


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For THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION


February 11, 2008

**BEFORE THE PUBLIC UTILITIES COMMISSION**
**OF THE STATE OF CALIFORNIA**

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| Order Instituting Rulemaking Regarding Policies, Procedure and Rules for California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues. | Rulemaking 06-03-004 (Filed March 2, 2006) |

# REPLY COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION ON THE PROPOSED DECISION ADDRESSING COMMUNITY CHOICE AGGREGATION NET ENERGY METERING SERVICE OPTION

In accordance with the Rules of Practice and Procedure of the Public Utilities Commission of the State of California ("Commission"), the Local Government Sustainable Energy Coalition ("LGSEC")[1] respectfully submits the following reply comments on the Proposed Decision (PD) issued by Commissioner Peevey on 1-15-08, Order Addressing Community Choice Aggregation Net Metering Service Option.

**I. The PD adequately protects all customers – whether bundled or CCA customers.** The Joint Utilities suggest that the PD doesn't protect bundled customers because "..the law requires all reasonable transaction-based costs, including billing, to be recovered from the CCA regardless of whether the amount is small or large."[2] The Joint Utilities cite Section 366.2 of the California Public Utilities Codes but the phrase "whether the amount is small or large" is added by the Joint Utilities and is not in the Code. The Joint Utilities fail to recognize that part of any definition of "reasonable" also means that the cost for collection of minor incremental costs should not exceed the incremental costs. The Joint Utilities would have the bundled customers pay for the cost of accounting and collection, regardless of the expense, which may indeed be the result of inefficiencies in the Joint Utilities' own billing systems.

While the Joint Utilities state that there will be incremental costs[3], they fail to provide any evidence of such costs, let alone that such costs might be of a magnitude that would warrant the separate collection of such costs from a CCA and the CCA customer-generators. In its comments on ALJ Duda's

[1] For purposes of this filing, the Local Government Sustainable Energy Coalition includes the County of Marin, County of Los Angeles Internal Services Department, Local Government Commission, City of Chula Vista, City of Pleasanton, City of Sebastopol, City of West Hollywood, City of Santa Monica, Redwood Coast Energy Authority, Community Environmental Council, City of Oakland-Public Works Agency, and City of Berkeley.
[2] Joint Utilities Comments at page 3.
[3] Joint Utilities Comments at page 4.

original proposal, SCE also described additional cost burdens it has identified related to CCA NEM customers without providing any evidence of such costs. LGSEC stated then that first believes that at least some of these cost burdens are non-existent (e.g. CCA's will identify for IOU's which of its customers are operating under NEM). SCE also ignores the fact that some of these tasks are also already undertaken for its own NEM customers – however these IOU customers are not directly charged for the costs related to these tasks. Rather all IOU ratepayers – including future CCA ratepayers will pay for any additional computer costs related to these tasks in their T&D bills. The Commission should reject the Joint Utilities proposed changes to the PD.

**II. The Joint Utilities request for change in language to clarify the credit for the customer-generator is acceptable.** While LGSEC does not think the current language conflicts with Public Utilities Code Section 2827(h)(3), and won't cause confusion for the utilities in implementing this decision, the clarifying language requested by the Joint Utilities (pages 5-6 of Joint Utilities comments) is acceptable. However, it would be easier to simply insert "pursuant to Public Utilities Code Section 2827(h)(3)" into the PD to eliminate any misinterpretation. The language would read as follows:

> "CCA customer-generators with solar generators up to 1 MW, and wind generators up to 50 kW will qualify for a bundled credit for power calculated over the course of a year pursuant to Public Utilities Code Section 2827(h)(3). The CCA in such cases will inform the utility of the applicable generation rate for the credit, and the utility will pass the credit on to the customer-generator. ~~The utility will credit the bundled transmission and distribution rates to the CCA for power.~~ The utility will provide a credit for the bundled transmission and distribution charges as set forth in the applicable NEM schedule to the CCA customer-generator's bill."[4]

**III. The ordering paragraphs can be simplified to be consistent with the NEM tariffs and rules concerning CCA billing.** Both the Joint Utilities and PG&E have requested changes to the ordering paragraphs for clarity and consistency with the CCA rules and NEM tariffs. The Joint Utilities point out that NEM customers have varying payment options and the annual payment option does not apply to all customers. We agree that citing the rules is a better approach than trying to paraphrase them in the order, and allows for changes in those rules and NEM tariffs without affecting this decision. In general, LGSEC finds the approach of the Joint Utilities preferable to PG&E's language changes. LGSEC supports the Joint Utilities changes to Ordering Paragraph 1.

The Joint Utilities recommend appending OP 2 and inserting a new OP 3 to read as follows:

> "2. Biogas and fuel cell generators and wind generators with capacity of more than 50 kW but less than 1 MW receive only the generation component of the rate as a credit consistent with the utilities' NEM service to bundled service customer-generators. The CCA is responsible for providing the CCA customer-generator with the applicable generation-related bill credit."

[4] LGSEC agrees with the Joint Utilities that this modification also clarifies that the NEM transmission and distribution credit is provided by the utility to the CCA NEM customer and not the CCA because the utility bills the CCA customers and not the CCA itself.

"3. The CCA will be responsible for timely providing the applicable generation-related bill charges or credits for each CCA customer-generator to the utility. The utilities will be responsible for providing an eligible CCA customer-generator with transmission and distribution (T&D) bill credits."

LGSEC supports adding the language "consistent with the utilities' NEM service to bundled service customer-generators." We support the clarification of who is responsible for any generation-related bill credit as long as clarification is also added that a CCA has sole authority to determine what generation-related credits it may provide.

PG&E urges a modification to "confirm that customer payments for generation charges, not credits, are forwarded from the utility to the CCA." CCA's may choose to credit NEM customer generators-for excess power generated or create other tariffs to promote renewable generation. Consistent with the Commission's finding that it has limited jurisdiction and no general regulatory oversight of CCAs, LGSEC recommends the Commission reaffirm in the Ordering Paragraphs that nothing in this language should be construed as limiting a CCA's ratemaking authority over the generation component of NEM tariffs. While it may not have been PG&E's intention to restrict this right, it is important to clarify that credits may indeed flow from the customer generator to the CCA and payments may flow from the CCA to the customer-generator.

PG&E also makes the distinction between the "bill-ready" and "rate-ready" billing options, the latter only being offered by PG&E. PG&E requests that the ordering language add "For utilities offering rate-ready billing, the generation rate component provided by the CCA will be used to calculate the applicable bill charges or credits." While supporting the distinction between "bill-ready" and "rate-ready", LGSEC does not want this language to be construed as limiting the tariff options, such as paying for excess power at a different rate. Consistent with our general support for clarity and consistency with the other guiding rules requested by the utilities, and the additional concerns expressed above, LGSEC recommends accepting the Joint Utilities changes to the Ordering Paragraphs with the following modifications:

"1. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall, within 20 days of the effective date of this order, submit tariff changes to implement "Net Energy Metering" (NEM) for customer-generators that are served by Community Choice Aggregators (CCA) consistent with NEM service to bundled service customer-generators and consistent with CCA rules as described in Rule 23 for SCE and PG&E and Rule 27 for SDG&E."

The Joint Utilities recommended appending and LGSEC modifies OP2 to read as follows:

"2. Biogas and fuel cell generators and wind generators with capacity of more than 50 kW but less than 1 MW receive only the generation component of the rate as a credit consistent

with the utilities' NEM service to bundled service customer-generators. The CCA is responsible for and has sole authority to determine the generation-related bill credits it may provide to the customer-generator."

The Joint Utilities recommended inserting a new Ordering Paragraph (OP3) that restates the responsibilities of the CCA and utilities with respect to generation-related and transmission and distribution-related bill charges and credits. While LGSEC doesn't find this necessary, it would accept the Joint Utilities language if modified as follows:

"3. The CCA will be responsible for providing the applicable generation-related bill charges or credits for each CCA customer-generator to the utility. The utilities will be responsible for providing the credits for transmission and distribution (T&D), and all other non-generation-related bill credits."

IV. **PG&E's request that the PD should "specify that Renewable Energy Credit (REC) treatment should be consistent for bundled customers and CCA net energy metered customers" should be rejected.** PG&E has requested that new language be added to Ordering Paragraph 1 as follows: "CCA net metered customers should enjoy the same Renewable Energy Credit (REC) ownership as bundled net metered customers." REC ownership issues have been and continue to be addressed in other proceedings and are not affected by this PD. This language also fails to recognize that many factors other than net metering contributed to past Commission decisions concerning ownership of RECs. It also does not recognize the right of the customer-generator to enter into bilateral agreements whereby the CCA or third party may purchase the RECs separately or as part of financing for renewable projects. LGSEC recommends against adding the proposed language.

LGSEC appreciates the opportunity to submit these reply comments. While we think the PD as written would not be confusing, we support some of the changes requested by the Joint Utilities and PG&E if modified with the language suggested in these comments.

Dated: February 11, 2008

Respectfully submitted,

By: _____/s/_____
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For THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of "COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION ON THE PROPOSED DECISION ADDRESSING COMMUNITY CHOICE AGGREGATION NET ENERGY METERING SERVICE OPTION" on all known parties to R.06-03-004 and R.03-10-003 by transmitting an e-mail message with the document attached to each party named in the official service list. Parties without e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on February 11th, 2008, at Mill Valley, California.

/s/
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